## MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

1300 MOUNT KEMBLE AVENUE P.O. BOX 2075 MORRISTOWN, NEW JERSEY 07962-2075 (973) 993-8100 FACSIMILE (973) 425-0161

WALTER KRZASTEK Direct dial: (973) 425-8149 wkrzastek@mdmc-law.com

December 26, 2012

VIA ELECTRONIC COURT FILING Hon. Robert B. Kugler, U.S.D.J. Mitchell H. Cohen U.S. Courthouse One John F. Gerry Plaza Camden, New Jersey 08101

RE: Hannah v. New England Compounding Pharmacy, Inc., et al.

U.S. District Court for the District of New Jersey Case No.: 1:12-cv-07180-RBK-KMW

Dear Judge Kugler:

This office represents Defendant Ameridose, LLC. On November 19, 2012 Defendant New England Compounding Pharmacy, Inc. d/b/a New England Compounding Center ("NECC") removed this case from the Superior Court of New Jersey, Cumberland County to the United States District Court for the District of New Jersey. On December 11, 2012, Plaintiffs filed a Motion to Remand, presently returnable on January 7, 2013. On December 24, 2012, NECC filed a Notice of Stay by Reason of Bankruptcy.

In light of NECC's filing, we respectfully request an adjournment of the January 7 motion day to the next available motion day, January 22, 2013. We have been advised that defendant NECC, prior to filing its Notice of Stay, received consent from Plaintiffs' counsel for an adjournment. We have also called Plaintiffs' counsel to confirm but have not been able to reach them yet. We thank the Court for its attention to this matter.

Respectfully,

MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

|s| Walter R. Krzastek

Walter R. Krzastek

Cc: All Counsel of Record (via ECF)

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